

Session 3 – CSBG/DOE ARRA Reporting Requirements
WEBINAR QUESTIONS and ANSWERS
September 10, 2009

Vendors

Q: Do we have to submit vendor information for vendors paid under \$25,000 in a cumulative total on the Vendor tab within CAAT?

A: Vendor information only needs to be reported when an individual vendor has received, either cumulatively or in one payment, more than \$25,000.

So in the case in question, the vendor has not been paid more than \$25,000. Therefore, you do not need to report their information.

Q: Please differentiate between vendors & subcontractors.

A: A subcontractor helps the sub-recipient entities carry out the core program functions. It is subject to compliance with the Federal program.

By contrast, vendors are brought in to contract specific goods and services that help achieve the program's ends. However, those goods and services are ancillary to the operation of the ARRA program. Vendors are also not subject to compliance with the Federal program.

The definition of vendors, as outlined in the Webinar and in Federal OMB Memo M-09-21, is as follows: "Dealers, distributors, merchants, or other sellers providing goods or services that are required for the conduct of a Federal program."

Q: Our CAA contracts with a company to provide all staffing, administrative support, office space and equipment for managing its organization and associated contract. Is the company providing this service a vendor or subcontractor?

A: This company is a vendor. Per Federal OMB Memo M-09-21, the definition is as follows: "Dealers, distributors, merchants, or other sellers providing goods or services that are required for the conduct of a Federal program."

Q: I'm not too clear; did you say that we must collect the DUNS numbers even from vendors whom we purchase goods?

A: Yes, for payments to vendors of at least \$25,000. In these cases, please report DUNS numbers for vendors, so long as they have DUNS numbers. Please also report the name and zip code of the vendor's headquarters.

If the vendor does not have a DUNS number, please report only the name and zip code of its headquarters (source: OMB M-09-21, pg. 9-10).

Officers/Compensation

Q: Do our subcontractors have to report the Highly Compensated names if the contract is over \$25,000?

A: Only sub-recipients (i.e. CSBG eligible entities) are required to report names of highly compensated officers, and only if the required conditions for reporting are met.

With respect to reporting contracts in amounts greater than \$25,000, that number applies only to vendors, and not to subcontractors.

Q: What if the persons in question are not "officers" of the organization or if they are doctors in our clinics? Does the requirement to provide the Highly Compensated names apply?

A: First, please always remember that the three conditions for Highly Compensated names outlined in the webinar (see "Description" column on CAAT spreadsheet and Federal OMB Memo M-09-21) need to be met before reporting "yes". If all conditions are not met, report "no".

For instance, if the doctor's sole function is as a clinician, then no, they are not considered officers. If the doctor has a position within the organization with executive decision-making authority then the doctor maybe considered an officer.

Q: Highly Compensated Names: MUST meet all three conditions or any of the three conditions?

A: Yes, all three conditions must be met to report the Highly Compensated names on the CAAT form. In the CAAT spreadsheet section "Officers/Compensation", the first data element, "Subrecipient indication of Reporting Applicability", spells out the three conditions.

Q: For a public Community Action Agency (CAA), do the 5 most highly compensated officers refer to those in the CAA or the County Department or County Government?

A: It refers to officers in the CAA.

Q: For a public CAA, do the 3 conditions for listing the 5 most highly compensated officers apply directly to the CAA or to the County Department or entire County Government?

A: The conditions apply to the CAA.

Jobs Numbers and Descriptions

Q: Will the number of jobs reported be for the period or cumulative for the entire period?

A: The number of jobs reported will be cumulative for each report period.

For example, once you are reporting on the second quarter, you must report all jobs created or retained by ARRA funds for the first and second quarters; for the third quarter, cumulative jobs for the first, second, and third quarters; and so on.

Q: How much information can we include under description of jobs created? I submitted a report for WIA ARRA and it only allowed us to submit a few lines of narrative.

A: As the "Field Type and Max Length" column states for "Subrecipient Description of Jobs Created", on the CAAT spreadsheet there is a max length of 4000 characters.

Q: We have hired staff as a result of ramp up for DOE ARRA but they are not working on ARRA right now because we don't have a contract yet. So do I report these jobs?

A: You cannot report these as jobs created if they are not being paid with ARRA dollars. Once the positions are transferred over to the ARRA program, then you can report their hours as ARRA jobs created.

Q: Full-Time Equivalent (FTE) jobs created on this report must be actual jobs filled, not vacant jobs? Is that correct?

A: Yes, FTE jobs must be actual jobs filled. If the job is vacant, then ARRA monies are not being used on it. Therefore, it is not a job "created or retained".

Q: Should we list jobs that we have placed, but have not yet received funds?

A: No.

The jobs need to be funded in whole or in part by ARRA monies. List these jobs, but only if they are funded in whole or in part by ARRA monies. If you fill the jobs without ARRA funds in one quarter, do not list them for that quarter. When you receive the funding in a subsequent quarter, report it in your cumulative count during the data call for that quarter.

Reporting

Q: What is the frequency of CAAT reporting?

A: Until further notice, the reporting frequency is quarterly.

Q: The report period does not appear on the report. How do you know what the report period is?

A: Because of the sensitivity of the spreadsheet's formatting, in terms of being able to successfully upload it to the CAAT system, the report period does not appear on the spreadsheet. For each "data call" notification, we will notify you which period the report is for, and which months that includes.

Q: Do we need to submit a CAAT report if we don't have a signed contract yet?

A: Yes. If you have been issued a CSBG ARRA contract, you must submit a CAAT report.

Q: If an entity has two CSBG ARRA contracts, does it have to submit a separate CAAT spreadsheet for each contract?

A: Yes. Please submit a separate CAAT spreadsheet for each contract.

Miscellaneous

Q: When will EARS be available to report the July/August data for ARRA?

A: EARS is now available for all CSBG ARRA fiscal reports.

Q: When you say "data call" do you mean a call for data, or another phone call?

A: By "data call", we mean a call for data. So we mean that a reporting interval is coming up, and the CAAT system is requiring sub-recipients (you, the agencies, in this case) to submit spreadsheets to prime recipients, and prime recipients (CSD, in this case) must submit all data to the CAAT system.

Q. What is CAAT?

A: CAAT stands for California ARRA Accountability Tool, which is an excel spreadsheet required by the California Recovery Task Force for state reporting of all ARRA data.

Q: Can you clarify the Total amount of sub-award disbursed?

A: Each agency (i.e. sub-recipient) is contracted for a total sub-award amount for the duration of the contract. The "Total Amount of Sub awards Disbursed" is the portion of that total that has been cumulatively disbursed from CSD (prime recipient) to the agency (sub-recipient), as of the quarter being reported.